

## REMARKS

Claims 1-21 are pending. Claims 1-21 are rejected. Applicants respectfully request reconsideration of the present application in view of the remarks set forth below.

### REJECTIONS UNDER 35 U.S.C. § 103

Claims 1-21 are rejected under 35 U.S.C. 103 as being unpatentable over U.S. Pat. No. 6,065,002 to Knotts et. al. (hereinafter “Knotts”) in view of U.S. Pat. No. 5,566,330 to Sheffield et. al. (hereinafter “Sheffield”). Applicants respectfully traverse these rejections.

The Office Action recites that Knotts in col. 5, line 53 and col. 6, lines 42-52 teaches processing properties as claimed. Applicants respectfully disagree. The “properties” in Knotts are not the same as the “processing properties for said processing services to define the execution of a batch application” as recited in claim 1 because the properties in Knotts are at a database field level as opposed to the application level as in claim 1. The “properties” in Knotts define how to process specific database fields rather than the “processing properties” in claim 1 specifying operation at an application level.

Knotts in col. 6, lines 42-52 does disclose that the “properties” specified by the user are used to customize the templates and functions to the user specific requirements. A closer reading of Knotts reveals that these “properties” are used with “slotted, hierarchy, date and translation concepts,” to define how to handle fields in a database. For example, in col. 7., lines 27-35, a property in Knotts is used to define a hierarchy of address priorities such as local address then home address then summer address.

On the other hand, claim 1 recites “processing properties for said processing services to define the execution of a batch application.” Some examples of processing properties for the processing services to define the execution of a batch application are execution time parameters, the source database where data is to be obtained, and the target database where data is to be written, (see, e.g., paragraph 78 and 79 on pages 10 and 11 in the Specification). These examples of processing properties define at an application level how to execute the batch application such as execution time and which database to use for the application. As compared with the “properties” in Knotts that define how to process database fields at a field level, the processing properties in claim 1 define how a batch application is to be executed at an application level. Thus, Applicants fail to see how Knotts teaches or suggests “processing properties” for processing services to define the execution of a batch application. Absent a teaching or suggestion of “processing properties” for processing services to define the execution of a batch application, claim 1 is allowable over Knotts.

Regarding the motivation to combine the Knotts reference with the Sheffield reference, the Office Action recites, “Applicant argued that Sheffield teaches [a] tool to define [an] interactive application where the claims require [a] tool to create specifications for execution of [a] batch application.” The Office Action also recites, “[t]he argument is not persuasive because the batch limitation is covered by the primary reference, Knotts.” However, assuming that the Data Window Painter of Sheffield is the design tool subsystem, one skilled in the art would not combine the batch limitation of Knotts with the Data Window Painter of Sheffield because Sheffield would be rendered unsatisfactory for its intended purpose. If a proposed modification would render the prior

art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900 (Fed. Cir. 1984). Here, the intended purpose of the Data Window Painter in Sheffield is to define a Data Window, which is an interactive application. For example, the Data Window is an object that “operates in response to an “event” such as a mouse click, input from the keyboard, or events generated in related scripts.” (col. 2, lines 40-42). The name of the Data Window Painter itself suggests painting data windows, which are interactive applications. Combining the batch limitation of Knotts with the Data Window Painter of Sheffield would render the Data Window Painter unsatisfactory for its intended purpose of defining interactive applications. Thus, there is no suggestion or motivation to make the proposed modification of Sheffield to combine it with Knotts. Therefore, claim 1 is allowable over Knotts and Sheffield for the above stated reasons.

Additionally, combining the batch limitation of Knotts with the Data Window Painter of Sheffield would change the principle of operation of the Data Window Painter of Sheffield. If the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti*, 270 F.2d 810 (CCPA 1959). The principle of operation of the Data Window Painter in Sheffield is to define interactive applications. Combining the batch limitation of Knotts with the Data Window Painter of Sheffield would change the principle of operation of the Data Window Painter of defining interactive application into defining batch applications. Thus, the principle of operation of Sheffield would be changed, and the teachings of

Knotts and Sheffield are not sufficient to render the claims prima facie obvious.

Therefore, claim 1 is allowable over Knotts and Sheffield for the above stated reasons.

The Office Action recites that Sheffield “is used as a secondary reference showing it is known in the art to provide [a] design tool for aiding the user so that he does not need to know or need to provide data in low level details.” The Office Action also recites that

“[i]t is obvious that a design tool for Knotts would have [an] appropriate feature for aiding the user in specifying/selecting the properties according to the user requirements.”

As argued above, the “properties” in Knotts does not teach or suggest the “processing properties” in claim 1. This, it would not have been obvious for the design tool for Knotts to have the appropriate feature for aiding the user in specifying/selecting properties because the “properties” in Knotts are different from the “processing properties” in claim 1.

1. Also, the “processing properties” of claim 1 do not specify data at a low level (i.e. database fields) as in Knotts or Sheffield. Claim 1 is related to defining and executing batch applications at an application level. Thus, the argument that it is known in the art to provide a design tool for aiding a user so that he does not need to know or need to provide data in low level details does not apply to claim 1 because the processing properties are already at a higher application level. Therefore, claim 1 is allowable over Knotts and Sheffield for the above stated reasons.

Additionally, the templates in Knotts are also at a lower database field level. In Knotts, the templates are containers of data fields such as employee data container, student data container, purchasing data container, recruiting data container, and people container (col. 5, lines 53-64). In contrast, in claim 1, the templates are at a higher application level. As recited in claim 1, the templates are defined by a set of

specifications that identify processing properties for the processing services to define the execution of a batch application. One advantage of the templates in claim 1 is that a template can be created by one user executing a batch application, and another user can tailor the template to their own version for their own particular needs (see, e.g. paragraph 76 in the Specification). Therefore, claim 1 is allowable over Knotts for the above stated reasons.

Claims 2-9 are dependent on claim 1 and are allowable for at least the same reasons as claim 1.

Claims 10-21 are rejected under similar rationales as for claims 1-9 and are allowable for at least the same reasons as claims 1-9.

## CONCLUSION

Therefore, in view of the above remarks this application is in condition for allowance, and the Examiner is respectfully requested to allow this application. The Examiner is invited to contact Applicants' undersigned representative regarding any issues that the Examiner feels are still outstanding.

Respectfully submitted,

Shisler et al.

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By: Eugene G. Kim

Eugene G. Kim  
Carr & Ferrell LLP  
2200 Geng Road  
Palo Alto, California 94303  
Phone: (650) 812-3400  
Fax: (650) 812-3444